## DON'T SAY IT — Write It!

DATE December 9, 2003

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TO Administrative Record

FROM Harold Tilden

DOE Letter 04-LOD-0001, transmitted on October 15, 2003 from Joel Hebdon, RL, to Mike Wilson, Ecology, was submitted to the Administrative Record for filing. Subsequent to the transmittal of this letter, it was noted that the certification statement in the attachment was inadvertently not completed prior to transmittal to Ecology. Attached is a copy of the completed certification statement for inclusion with the October 15, 2003 letter submitted by RL.

This document is filed with T-3-4, 325 Hazardous Waste Treatment Units.

If you have any questions, you may contact Theresa Aldridge, Pacific Northwest Site Office, DOE at 372-4508 or me at 375-2966.

cc: TL Aldridge Environmental Portal, FH PNNL request that procedural closure in accordance with Section 6.3.3 of the Hanford Federal Facility Agreement and Consent Order Action Plan be approved by Ecology.

## 5.0 RADIOACTIVE LIQUID WASTE TANK PROCEDURAL CLOSURE TECHNICAL DATA SYNOPSIS CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Owner/Operator

Keith A. Klein, Manager U.S. Department of Energy Richland Operations Office DEC 9 2003

Date

Co-Operator

Roby D. Enge, Director

Environment, Safety, Health, and Quality Pacific Northwest National Laboratory Date

Radioactive Liquid Waste System during the construction of the new RLWT. Some of the existing piping in the RPL had been used to transfer F-listed hazardous waste to the former system.

The integrity assessment of the new tank system components was performed as an integral part of the design, construction and installation of the new components. After all of the new tank system components were installed they were leak tested prior to connecting the new components to the preexisting piping that was located in the RPL. Clean water was used for the leak testing, and the water was then removed from the tank and disposed of. Therefore, this leak testing did not result in any hazardous waste being introduced into the new system components.

The integrity assessment, including leak testing, of the preexisting piping was performed prior to 1997 as part of the integrity assessment of the room 40A and room 32 tank systems. The water from this test was transferred via the 300 Area Radioactive Liquid Waste System.

The last step of the new RLWT installation was cutting into the preexisting piping and making tie-in welds between the preexisting and new system components. These final tie-ins were never leak tested because to do so would have resulted in F-listed hazardous waste in the tank with no way to dispose of the waste (see discussion in Section 3.2.2 above.)

Hence, the construction and associated integrity assessment activities did not result in the RLWT being used to treat or store hazardous waste.

## 3.2.4 Field Evaluations

A facility walkthrough was conducted on September 26, 2003 by EMSD staff. Specific verification of the following data points was conducted as part of the walkthrough.

- The lines leading into the RLWT were inspected and confirmed to be valved closed and locked.
- All lines were physically observed to verify that no evidence of waste is present in the lines and that no physical modification has been made to the lines (i.e. could suggest an attempt at unauthorized disposal).

The facility walkthrough indicated no evidence of unauthorized waste disposal, or of any activity that would indicate the tank and piping has been utilized for any purpose since 1998.

## 4.0 Summary

No activities have been conducted within the scope of the RLWT that would constitute treatment, storage, or disposal of dangerous or mixed waste, and none are planned to take place. There is no indication of any activity in the RLWT since it was installed. RL and